

**Remarks**

In the Office Action, claims 1-9, 11-18, 20-28, and 32 were rejected under 35 U.S.C. § 102(e) and claims 10, 19, 29, 32, and 38-45 were rejected under 35 U.S.C. § 103(a).

Claims 1-45 are currently pending in the instant application.

**§ 102 Rejections**

Claims 1-9, 11-18, 20-28 and 32 were rejected under § 102(e) as being anticipated by U.S. Patent 6,128,602 (“Northington”). Applicants respectfully disagree.

**Claim 1 Is Not Anticipated by Northington**

Claim 1 is directed to a system for managing a plurality of assets of a plurality of distributed enterprises, including, in part, “a database for storing asset information for the plurality of assets of the plurality of enterprises,” and a central processor that “tracks information relevant to managing each of the plurality of assets.”

As noted by William A. Estrem, Ph.D. in the attached Declaration, the “assets” of claim 1 as set forth in the present application are physical items or equipment that can be maintained or serviced, such as refrigerators, air conditioners, computer systems, and the like. For example, in one embodiment of the invention in the present application, it is noted that

a service provider user has access to all assets of a type that he services and all work orders that he is responsible for fulfilling. These assets may include assets located at various distributed sites and may even include assets owned by distinct enterprises. An equipment manufacturer may have access to the assets at the various distributed sites that it manufactured.

See Present Application, p. 10, ll. 7-11. Thus, the “assets” of the present invention are physical items or equipment.

Northington, in contrast, does not disclose the invention of claim 1. As explained by Dr. Estrem in the attached Declaration:

Northington discloses an open architecture system that consolidates information from a plurality of financial systems into a single accounting system. See Northington, Abstract. The system provides for “monitoring, management, and reporting of *financial accounts and transactions performed by the financial systems*.” Id. at col. 2, ll. 49-51 (emphasis added). Thus, Northington teaches management of financial accounts and transactions. Northington does not teach or suggest a database for storing asset information for a plurality of assets of a plurality of enterprises or a central processor that tracks information relevant to managing each of the plurality of assets. Northington, therefore, fails to teach or suggest the invention of claim 1.

See Declaration, paragraph 8.

Reconsideration and withdrawal of the rejection is respectfully requested.

*Claims Depending From Claim 1 Are Patentable*

Because claims 2-19 depend directly or indirectly from claim 1 and incorporate all the limitations of claim 1, the above argument obviates the basis for this ground of rejections. Thus, claims 2-19 are not anticipated by Northington. Reconsideration and withdrawal of the rejections is respectfully requested.

*Claim 20 Is Not Anticipated by Northington*

Claim 20 is directed to a system for managing enterprise assets of a highly distributed enterprise, including, in part, a website hosted by at least one computer wherein the computer “tracks information relevant to determining a total cost of ownership for each asset.”

Northington, in contrast, does not teach or suggest the invention of claim 20. As discussed by Dr. Estrem:

Northington discloses a system that consolidates information from a plurality of financial systems into a single accounting system. The system provides for monitoring, management, and reporting of financial accounts and transactions performed by the financial systems. Northington does not teach or suggest a website hosted by at least one computer wherein the computer tracks information relevant to determining a total cost of ownership for each asset. Northington, therefore, fails to teach or suggest the invention of claim 20.

See Declaration, paragraph 9.

Reconsideration and withdrawal of the rejection is respectfully requested.

*Claims Depending From Claim 20 Are Patentable*

Because claims 21-29 depend directly or indirectly from claim 20 and incorporate all the limitations of claim 20, the above argument obviates the basis for this ground of rejections. Thus, claims 21-29 are not anticipated by Northington. Reconsideration and withdrawal of the rejections is respectfully requested.

*Claim 30 Is Not Anticipated by Northington*

Claim 30 is directed to a method of managing enterprise assets of a highly distributed enterprise including “storing asset information pertaining to a factor for each asset identified in a database” and “receiving user specified requests for asset information form a client processor at a remote site.”

Northington, in contrast, does not teach or suggest the invention of claim 30. As explained by Dr. Estrem:

Northington discloses a system that consolidates information from a plurality of financial systems into a single accounting system. The system provides for monitoring, management, and reporting of financial accounts and transactions performed by the financial systems. Northington does not teach or suggest storing asset information pertaining to a factor for each asset identified in a database and receiving user specified requests for asset information from a client processor at a remote site. Northington, therefore, fails to teach or suggest the invention of claim 30.

See Declaration, paragraph 10.

Reconsideration and withdrawal of the rejection is respectfully requested.

*Claims Depending From Claim 30 Are Patentable*

Because claims 31-37 depend directly or indirectly from claim 30 and incorporate all the limitations of claim 30, the above argument obviates the basis for this ground of rejections. Thus, claims 31-37 are not anticipated by Northington. Reconsideration and withdrawal of the rejections is respectfully requested.

**§ 103 Rejections**

Claims 10, 19, 29 and 32 were rejected under § 103(a) as being unpatentable over Northington. Further, claims 38-45 were rejected under § 103(a) as being unpatentable over Karen Abramic Dilger entitled "Asset Management, Maintenance Redefined," (Manufacturing Systems, v15n7, pp. 122-128, July 1997, CODEN: MASYES<ISSN; 0748-0948X, JRNL CODE: MFS, Dialog file 15, Accession No. 01493159) ("Dilger") and/or U.S. Patent 5,918,207 ("McGovern"). Applicants respectfully disagree.

*Claim 1 Is Not Made Obvious by Northington*

As discussed above, claim 1 is directed to a system including a database for storing asset information for the plurality of assets of the plurality of enterprises, and a central processor that tracks information relevant to managing each of the plurality of assets. The claimed "assets" are physical items or equipment that can be maintained or serviced, such as refrigerators, air conditioners, computer systems, and the like.

As also discussed above and by Dr. Estrem in the attached Declaration at paragraph 8, Northington does not teach or suggest the invention of claim 1. Instead, Northington teaches management of financial accounts and transactions. Northington does not teach or suggest a

database for storing asset information for a plurality of assets of a plurality of enterprises or a central processor that tracks information relevant to managing each of the plurality of assets. Northington, therefore, fails to teach or suggest the invention of claim 1.

*Claims 10 and 19 Are Patentable*

Because claims 10 and 19 depend directly from claim 1 and incorporate all the limitations of claim 1, the above argument obviates the basis for this ground of rejection. Thus, claims 10 and 19 are not made obvious by Northington. Reconsideration and withdrawal of the rejections is respectfully requested.

*Claim 20 Is Not Made Obvious by Northington*

As discussed above, claim 20 is directed to a system for managing enterprise assets of a highly distributed enterprise, including, in part, a website hosted by at least one computer wherein the computer tracks information relevant to determining a total cost of ownership for each asset.

As also discussed above and by Dr. Estrem at paragraph 9 of the Declaration, Northington does not teach or suggest the invention of claim 20. Instead, Northington teaches management of financial accounts and transactions. Northington does not teach or suggest a website hosted by at least one computer wherein the computer tracks information relevant to determining a total cost of ownership for each asset. Northington, therefore, fails to teach or suggest the invention of claim 20.

*Claim 29 Is Patentable*

Because claim 29 depends directly from claim 20 and incorporates all the limitations of claim 20, the above argument obviates the basis for this ground of rejection. Thus, claim 29 is not made obvious by Northington. Reconsideration and withdrawal of the rejection is respectfully requested.

*Claim 30 Is Not Made Obvious by Northington*

As discussed above, claim 30 is directed to a method of managing enterprise assets of a highly distributed enterprise including storing asset information pertaining to a factor for each asset identified in a database and receiving user specified requests for asset information from a client processor at a remote site.

As also discussed above and by Dr. Estrem at paragraph 10 of the Declaration, Northington does not teach or suggest the invention of claim 30. Instead, Northington teaches

management of financial accounts and transactions. Northington does not teach or suggest storing asset information pertaining to a factor for each asset identified in a database and receiving user specified requests for asset information from a client processor at a remote site. Northington, therefore, fails to teach or suggest the invention of claim 30.

*Claim 38 Is Not Made Obvious by Dilger or McGovern*

Claim 38 is directed to method of generating service requests in a highly distributed enterprise to a plurality of service providers from a plurality of distributed asset sites, the method comprising, in part, "a database containing asset information and service provider information."

Dilger, in contrast, fails to teach or suggest the invention of claim 38. As explained by Dr. Estrem in the attached Declaration:

Dilger fails to describe any system with sufficient clarity and detail to establish that the subject matter existed in any operable form with any elements as claimed in the Present Application. In fact, Dilger fails to disclose, teach, or suggest an operable method or system of any kind. At best, Dilger is an interesting article about companies and their plant maintenance systems that fails to disclose any subject matter of the Present Application in the same way a picture of a computer is interesting but fails to disclose the components of the computer or how the computer operates. Thus, it is my opinion that one of ordinary skill in the art, reading Dilger, would be unable to create a method or system of the present invention as set forth in the claims in Appendix A.

See Declaration, paragraph 11.

More specifically, Dr. Estrem states that:

Dilger fails to teach or suggest a database containing asset information and service provider information as claimed in claim 38.

See Declaration, paragraph 12. Thus, Dilger fails to teach or suggest the invention of claim 38.

McGovern, furthermore, fails to remedy the deficiencies of Dilger. As discussed by Mr. Estrem:

McGovern discloses a "system for predictive resource planning to allow a service provider to meet a customer's predicted technical resource requirements." See McGovern, Abstract. In the McGovern system, "the service provider matches candidates to customer requirements while concurrently matching candidates to technical profiles." Thus, McGovern teaches that a single service provider matches individuals to customer requirements. McGovern does not disclose selecting a service provider based on the asset to be serviced, and in fact does not disclose assets to be serviced. Thus, McGovern fails to teach or suggest the method of claim 38.

See Declaration, paragraph 13.

Therefore, neither of Dilger nor McGovern, alone or in combination, teach or suggest the invention of claim 38. Reconsideration and withdrawal of the rejection is respectfully requested.

*Claims 39-45 Are Patentable*

Because claims 39-45 depend directly or indirectly from claim 38 and incorporate all the limitations of claim 38, the above argument obviates the basis for this ground of rejection. Thus, claims 39-45 are not made obvious by Dilger or McGovern. Reconsideration and withdrawal of the rejections is respectfully requested.

**Conclusion**


Applicant respectfully submits that claims 1-45 are in condition for allowance.  
Reconsideration and a Notice of Allowance for all pending claims is respectfully requested.

This response is being submitted on or before June 27, 2005, with a Petition for a Two Month Extension of Time, and the required fees, making this a timely response. It is believed that no additional fees are due in connection with this filing. However, the Commissioner is authorized to charge any additional fees, including extension fees or other relief which may be required, or credit any overpayment to Deposit Account No. 04-1420.

Respectfully submitted,

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